

December 7, 2006

Mr. Don West  
Environmental Management Support, Inc.  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910

Ms. Deborah Orr  
EPA Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3507

Dear Mr. West and Ms. Orr:

The City of Rockford is pleased to submit our application to the USEPA for a \$ 200,000 Cleanup Grant for the Rock Street Frontage Property. This property was part of the former Barber Colman manufacturing facility. The site is located within an economically distressed area of the City. The City has conducted site assessment activities and found that in order to redevelop and reuse the existing structures, the lead-based paint, asbestos, and contaminated soil need to be addressed. The cleanup dollars provided by the requested grant will provide the City with the catalyst for this redevelopment.

This area is in desperate need of jobs, basic retail and commercial services as well as recreational areas. The site is located near the Rock River and a major transportation corridor, South Main Street that serves the Downtown. Our goal is to redevelop the site and create a livable, walkable community that thrives.

**Applicant Identification:** City of Rockford, 425 East State Street, Rockford, Illinois, 61104

- a) **Funding Requested:** \$200,000
- b) **Grant Type:** Cleanup Grant
- c) **Contamination:** Hazardous Substances
- d) **Type of Assessment Grant:** Site-specific

**Location:** City of Rockford, Winnebago County, State of Illinois

**Chief Executive:** Mayor Lawrence J. Morrissey  
425 East State Street, Rockford, Illinois 61104  
P: 815.987.5590 F: 815. 967.6952  
Email: [jennifershelton@ci.rockford.il.us](mailto:jennifershelton@ci.rockford.il.us)

**Project Contacts:** Wayne Dust, AICP, Planning Administrator  
Department of Community and Economic Development  
425 East State Street, Rockford, Illinois 61104  
P: 815.987.5636 F: 815.967.6933

Email: [wayne.dust@ci.rockford.il.us](mailto:wayne.dust@ci.rockford.il.us)

**Date Submitted:** December 7, 2006

**Project Period:** October 2007 – September 2008

**Population:** 150,115 (2000 Census)

**Other:** The City of Rockford is a State designated Enterprise Zone and a “Labor Surplus Municipality”

**Cooperative Partners:** Rockford Park District (Tim Dimke, 815.987.8800, including the Burpee Museum of Natural History; Rockford Local Development Corporation (John Phelps, 815.987.8675); River District Association (Kim Wheeler, 815.964-6221); Southwest Ideas for Today and Tomorrow (SWIFT) (Roger Sexton, 815.965.3606); Comprehensive Community Solutions, Inc. (Kerry Knodle, 815.963.6236)

We are at a very critical juncture at this site due to the necessary cleanup costs that are required for reuse or redevelopment of the structures. The existing three structures on the site are designated as contributing structures to a Historic district. The City would like to take advantage of this designation; however, the City realizes that obtaining funding for environmental cleanup is necessary in order to gain developer interest. New opportunities are always on the horizon.

Very truly yours,

Lawrence J. Morrissey  
Mayor  
City of Rockford

LJM/jls

## **Project Description**

### **Threshold Criteria for Cleanup Grant**

#### **Applicant Eligibility**

Rockford is a municipal corporation formed by the authority of the State of Illinois. Rockford is eligible to apply for Cleanup Grants from the USEPA. The City of Rockford currently owns the Rock Street Frontage Property located within the Barber Colman Village Redevelopment Area. The City intends to perform remediation activities on this site; after which time the site will be sold or turned over to a developer for redevelopment.

#### **Letter from the State or Tribal Environmental Authority**

The Letter from the Illinois Environmental Protection Agency is provided in Attachment A.

#### **Site Eligibility and Property Ownership Eligibility**

##### **1. Basic Site Information**

- a. Name of the Site: Rock Street Frontage Property
- b. Address: 1200 Rock Street
- c. Current Owner: The City of Rockford
- d. Date of Ownership: The City of Rockford acquired this property in 2002.

##### **2. Status and History of Contamination at the Site**

- a. Type of Contaminant: Hazardous Substances
- b. Operational History: The Site was previously used as office space and textile machinery manufacturing facility. In the mid-1980's the site was used as a location for business incubators after it had been closed by the Former Barber Colman Company. The Rock Street Frontage Property includes three buildings or sections of the former Barber Colman complex, Sections 5, 10, and 19. Section 5 is a large six-story building that contained offices and manufacturing processes. Section 10 is the former office building and cafeteria. Section 19 was used as a manufacturing area. All three of the buildings are currently vacant.
- c. Environmental Concerns: The environmental concerns for the Rock Street Frontage Property consists primarily of lead-based paint, asbestos materials, and the presence of contaminants of concern in the soil. Phase I and Phase II environmental site assessments (ESA) were conducted on this site. The Phase I indicated that the former industrial/manufacturing nature of the site and

surroundings properties was an environmental concern. The Phase II ESA indicated the presence of some contaminants in the soil above the Illinois Site Remediation Program (SRP), Tiered Approach to Corrective Action Objectives (TACO) for Residential Properties.

- d. Nature and Extent of the Contamination: The site became contaminated due to its historical use as a manufacturing facility and due to the age of the facility, where lead based paint and asbestos containing materials were regularly used in the construction process. Contaminants of concern in the soil exceed TACO Residential Soil and Groundwater Remediation Objectives. The primary contaminants of concern are volatile organic compounds, semi-volatile organic compounds, and metals. These exceedances are for the soil ingestion and migration to groundwater exposure pathways. The migration to groundwater exposure pathway is a concern because the Rock River is located within 1500 feet of the site. In addition to the soil and groundwater contamination it was found that the buildings contain lead-based paint and asbestos containing materials.

### 3. Sites Ineligible for Funding

- a. Listing on NPL: The site is not and is not proposed to be listed on the National Priorities List.
- b. CERCLA: The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA
- c. United States Government: The site is not subject to the jurisdiction, custody, or control of the United States Government

### 4. Sites Requiring a Property-Specific Determination

The Rock Street Frontage Property does not require a Property-Specific Determination. This site is eligible for funding from the USEPA. None of the criteria listed in Appendix C, Section 3.4 of the Proposal Guidelines for Brownfields Assessment, Revolving Loan Fund, and Cleanup Grants apply to this property.

### 5. Environmental Assessment Required for Cleanup Proposals

A Phase I ESA was conducted on the property in August 2000. The Phase I was conducted in accordance with the prevailing standard at the time, which was the ASTM E1527-00. Phase II ESAs were conducted on the properties in 2002 and 2006. The results of the Phase II investigation were summarized in a Comprehensive Site Investigation Report, Remedial Objectives Report, and Remedial Action Plan that was submitted to the Illinois SRP in June 2006. The IEPA is currently reviewing the combined document.

### **Property Ownership Eligibility**

- 6. The City of Rockford is not a potential liable party for contamination at the site under CERCLA's bona fide prospective purchaser provision. The City has provided proof that this

provision was met to the USEPA Region V Brownfield Division for previous grant opportunities for the former Barber Colman manufacturing facility.

## 7. Enforcement Actions

The City is not aware of any enforcement actions for this property. The City of Rockford has enrolled the site into the Illinois EPA voluntary Site Remediation Program with the intent of receiving a No Further Remediation (NFR) letter for the property.

## 8. Information on Liability and Defenses/Protections

- a. **Information of Property Acquisition:** The City of Rockford purchased the property in January 23, 2002 as a result of an effort to purchase a future retail site to the west of the manufacturing site. The previous owner, Reed-Chatwood, would not separate the manufacturing site from the support parking to the west of Rock Street. Therefore, the City negotiated purchase of the support parking and the former manufacturing facility. The City is the sole owner of the property.
- b. **Timing of Hazardous Substance Disposal:** Any disposal of hazardous substances occurred at the site prior to ownership by the City of Rockford. The City has not caused or contributed to any release of hazardous substances at the site. The City has not arranged and will not arrange to have hazardous substances disposed of or transported to the site.
- c. **Pre-Purchase Inquiry:** The City of Rockford performed a Phase I ESA in accordance with ATSM E1527-00 in 2000 and conducted Phase II ESA in 2002 and 2006, all through the use of USEPA Brownfield Assessment Grants. The Phase I ESA was performed by URS Corporation, a national engineering/environmental professional consulting firm. URS Corporation and Wight & Company conducted the Phase II ESAs. Wight & Company is a regional engineering/environmental professional consulting firm.
- d. **Post-Acquisition Users:** The Property has not been used since the City of Rockford took ownership in 2002. The property has controlled access via a gated fence system.
- e. **Continuing Obligations –** The City has installed a controlled access system so that no unauthorized persons have access to the property. This controls any illegal activities that may occur at abandoned facilities. The City has entered the property into the IEPA voluntary remediation program. The City has conducted Phase II ESAs in accordance to both the USEPA Brownfield program and the IEPA Site Remediation Program to determine if there are any concerns to human health and the environment. The City has prepared the Remedial Action Plan; however, remediation dollars are not available to the City at this time. This cleanup grant opportunity will facilitate the removal of hazardous substances for the property so that the property may be redeveloped.

The City of Rockford will comply with all of the land use restrictions and institutional controls that are applicable to the property's remediation activities. The City will provide full access to the contractor's responsible for the remediation activities at the site. The City will comply with all information requests and administrative subpoenas

that have or may be issued in connection with the property. Any legal notices required as part of remediation activities will be provided by the City of Rockford.

9. Petroleum Sites – This question is not applicable to this site.

### **Cleanup Authority and Oversight Structure**

1. The City of Rockford has already entered the site into the IEPA SRP. This is a voluntary based cleanup program for the State of Illinois. The City has prepared all of the documentation for the property and submitted this documentation for review and approval. The last remaining step under this program is the cleanup activities for the site. The City is preparing this grant application in the hopes of acquiring the necessary dollars to conduct cleanup activities for the site. Remedial action for the property will be carried out in accordance with the IEPA SRP as well as any City ordinances for construction or demolition and the Winnebago County Health Department. An environmental consultant will conduct cleanup oversight and will provide details of the cleanup activities. A Remedial Action Completion Report (RACR) will be submitted to the City of Rockford, to demonstrate that remediation has occurred, and to the IEPA in order for the site to receive a NFR.

2. The City of Rockford currently owns the immediately adjacent properties; therefore, access to these properties is not a concern and access will be provided for the remediation activities. In the event that one of these properties is sold, the City of Rockford will request a right of entry agreement to obtain environmental data for cleanup activities.

### **F. Cost Share**

The City of Rockford will provide for the 20% cost share of the \$200,000 cleanup grant through the use of programmatic expenses. The \$40,000 will be made up from:

- the labor hours of the Brownfield Coordinator for management and oversight of the cleanup activities
- the City's public works department to prepare and solicit public bids for the remediation activities at the site and the management of these contractors
- Legal fees in relation to cleanup activities and the filing and reviewing of the NFR. The review fees applied by the IEPA SRP to review and provide for the NFR will be paid by the City of Rockford.

### **Ranking Criteria for Revolving Loan Fund Grants**

#### **A. Cleanup Grant Budget**

Hazardous Substances

Budget Categories	Project Tasks				
	Task 1	Task 2	Task 3	Task 4	

(programmatic costs only)	Community Involvement	Cleanup Planning / Action Plan	Site Cleanup	Site Cleanup Oversight	<b>Total</b>
Personnel					
Fringe Benefits					
Travel <sup>1</sup>					
Equipment <sup>2</sup>					
Supplies					
Contractual <sup>3</sup>		\$10,000	\$1,200,000*	\$120,000	\$1,330,000
Other (specify)_____					
<b>Subtotal</b>					
<b>Cost Share</b>	\$5,000	\$10,000	\$15,000	\$10,000	\$40,000
<b>Total</b>	\$5,000	\$20,000	\$1,215,000	\$130,000	\$1,370,000
Notes:					
1 Travel to Brownfield-related training conferences is an acceptable use of these grant funds.					
2 EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies.					
3 Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48					

\* The City understands that the cleanup costs are well above the requested \$200,000 available from the cleanup grant for this site; however, the City is also applying for the Brownfield Revolving Loan Fund to supplement the cleanup costs.

### **Task 1: Community Outreach**

The objective of this task is to inform the community as a whole and the community within the site Area of the City's intent to conduct environmental cleanup activities and provide details on cleanup plans and redevelopment efforts for the site. The City intends to rely primarily upon the following Community Outreach efforts 1) monthly Ward Meetings conducted in the Property Area (Alderman Victory Bell) 2) Planning and Development Committee Meetings of the City of Rockford, which are open to the public, published in all the media, and reported upon by the media; 3) the City of Rockford Website, press releases and legal notices in the local newspapers. The Planning Administrator, who also acts as the City's Brownfields Coordinator, will request input from the business community, on an as-appropriate basis, during monthly meetings with the Chamber of Commerce and River District Business Association.

### **Task 2: Cleanup Planning/ Action Plan/ Cleanup Bid Specifications/ RFP Process**

The local Brownfields Coordinator, Wayne Dust, Planning Administrator for the City of Rockford, coordinates with the Illinois Environmental Protection Agency on a regular basis, including the enrollment of sites in the SRP and the review of the Remedial Action Plans. Mr. Dust has also attended the 2004, 2005 and 2006 USEPA/ ICMA National Brownfields

Conferences and has benefited from the excellent training provided at these conferences. He will attend future National and Illinois Brownfields Conferences.

Mr. Dust will use his experience on past cleanup projects to manage and oversee the activities that are necessary prior to cleanup activities. This includes the preparation of bid specifications for contractors to ensure the appropriate tasks are completed, the required regulations are followed. This also allows the City to obtain fair pricing and follow the appropriate procurement process.

A paint survey was conducted within each of the remaining buildings on the site. Cleanup costs were estimated based on the results of that investigation. The lead-based paint cleanup was based on the reuse of the buildings where encapsulation of the existing paint was an appropriate remedial action. However, the flaking paint on the walls and paint chips that have fallen on the floors would be removed and disposed.

### **Task 3: Site Cleanup**

As part of the Phase II ESA an asbestos and lead-based in accordance with the applicable laws and regulations. The asbestos containing materials would be removed from the buildings. The estimated cleanup cost to remove the lead-based paint is approximately \$200,000. The estimated cleanup cost to remove the asbestos containing materials is \$1,000,000.

The contaminated soil will be remediated by the use of engineered barriers exposure pathways may be eliminated through the use of institutional controls. The City anticipates a cost share of \$15,000 for site cleanup activities. This includes management, IEPA fees, and labor hours during cleanup activities.

### **Task 4: Oversight of Site Cleanup**

The oversight of the lead-based paint cleanup is estimated to be approximately \$20,000. The remediation oversight for the asbestos containing material removal is estimated to be approximately \$100,000 from a contractual basis. The oversight of City personnel and legal fees to finalize cleanup activities is anticipated to be \$10,000.

## **B. Community Need**

1. Description of targeted community-The City of Rockford, Illinois was once a thriving manufacturing community, which has since faced decades of neglect and decline. Rockford was designated by the State of Illinois as an Enterprise Community in 1989; a designation based on poverty, unemployment, and economic growth factors. Prior to 2006, the City had created 14 Tax Increment Finance (TIF) districts in recognition of the area's continuing physical distress and economic decline. During 2006 alone, an additional 7 TIF Districts were created or are in process. During 2003, The Global Trade Park Industrial Recovery RPLA was created. Rockford qualified for this special redevelopment planning area designation because of unemployment above the state average.

Rockford is a diverse community with a minority population of 31.6% according to the 2000 Census. For the City as a whole, the African-American population is 17.2% of the total



population while the Hispanic or Latino population is 10.5 % of the total population. Also, 14% of the total population is living below the poverty level with 10.5% of families living below the poverty level in Rockford as a whole. Median household income was \$37,667.

The site proposed for cleanup is located within the Near West and Southwest Area in and near the Downtown. This area is comprised of Census Tracts 25,26, 27,28 and 29 and has a total population of 14,418. The area contained within these Census Tracts has a strong concentration of poverty, poor housing and limited services. Collectively this area has a minority population of over 75%, an African American population of 52.3 %, a Hispanic or Latino population of 24.4 % and a persons living below the poverty level of 35.6%, over one third of the total population of this area. Nearly one third of all the families, 32.1 % are living below the poverty level. Median household income is roughly half that of the City as a whole, \$19,661. The average residential structure in this area is over 55 years old. The 2000 Census reported unemployment for the City as a whole at 4.7%. Average unemployment for 2005 was estimated at 8.1% for the entire City, but was 19.4% in the Near West and Southwest Area. Three of the included Census Tracts were over 20% unemployment for 2005. (Illinois Monthly Labor Force Report, Illinois Department of Employment Security). 2000 Census data also reveals that 22% of the City's population 18 and over never finished high school, while, in the Near West and Southwest Area the figure was over twice as high at 48.4 %.

Very few retail services or other basic services can be found within this Near West and Southwest Area. There is only a single grocery store and no general merchandise store located within this area. Clearly the area surrounding this proposed cleanup site is severely economically distressed and impacted by the extensive Brownfields nearby.

2. How will the targeted community benefit- this Program will support the continuous brownfield initiative by the City of Rockford to redevelopment areas of the City that are not economically viable. Previous USEPA Brownfield funding was provided to conduct assessments at the site. These assessments have identified the need to remediate the existing buildings to a condition that would be suitable for redevelopment. The City of Rockford does not have the capital to fund the remediation activities for the site. The environmental cleanup of the site will improve the City's ability to redevelop the site. The redevelopment site will be developed to provide basic services to the surrounding community as well as major public open spaces such as greenways and pathways along the Rock River, nearby, and the regional system.
3. Characterize the impact of brownfields on your community- Rockford has been the home base of many manufacturing giants such as Ingersoll, Barber Colman, J.I. Case, , National Lock, and Sundstrand. Increasing wage costs, aging facilities, and the economy contributed to the decline of manufacturing in Rockford.

The manufacturing apex for the City of Rockford was in the 1960s, by the mid-1980s unemployment was at 25%-the highest in the nation. Manufacturing giants, such as Barber Colman, had its workforce dwindle from a high of 6,000 employees to less than 100 in 2000. Facilities such as Barber Coleman have been shut down as companies relocated their plants to

the southern United States and to third world countries. Commercial areas near these now vacant factories have experienced serious decline.

The brownfield properties have a negative impact on development within redevelopment areas designated by the City. Residential properties adjacent to many of these abandoned industrial buildings are poorly maintained. The parks located in the brownfield areas are underutilized and many of the vacant buildings are accessible to the community and used for criminal activities. The areas have become blighted and may cause harm to the human environment.

There are numerous greenfield industrial and commercial development sites adjacent to and within the City of Rockford, and the existing Brownfield properties area located in the older and economically distressed areas of the City. Rockford has tried to discourage the development of greenfields by restricting variances and special use permits at greenfield sites and not providing any incentives. The City has been working with local developers as well as entities such as GSA to look at redeveloping Brownfield sites, but this usually requires a major subsidy by the City. The Brownfield Cleanup programs are especially important in helping to make these Brownfield sites more attractive to development.

### **C. Sustainable Reuse of Brownfields**

This Cleanup Grant will be an important step in preventing pollution and reducing resource consumption because of several factors as follows:

1). *Prevent Pollution and reduce resource consumption* - The site is located in the Downtown area and in close proximity to the Rock River. The redevelopment of this project includes the City of Rockford and the Rockford Park District plans for a continuous system of Greenways and Pathways along the Rock River and major creeks while linking with the major regional pathway system including the Grand Illinois Trail. The site has redevelopment plans that include job creation and commercial and residential developments that focus on walking, non-motorized transportation, and in bad weather, public transportation, as the primary means of transportation to work or for recreation. This focus on creating several development nodes that encourage non-motorized transportation, as part of the lifestyle is an important means of preventing pollution. In addition, the plan for the area includes the use of one of the three railroad trestles across the Rock River as a pedestrian bridge linking the recreation paths on either side of the river.

a) *Brownfield prevention* - This important goal will be accomplished by the City efforts for the site. Without the City's concern for the redevelopment of Brownfields within the Rock River Corridor and the USEPA programs to assist with these redevelopment efforts Brownfield Areas would simply expand and intensify over time as more and more industrial buildings approach the end of their life. Instead, many buildings along the Rock River Corridor have been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of the area. Prevention of brownfields and preventing existing brownfields from expanding or intensifying is extremely important to surrounding neighborhoods, which, as demonstrated in Section B, are already economically disadvantaged.

b) *Infrastructure reuse, native landscaping, innovative storm water management/ reuse and construction debris/fill reuse* - Each of these important goals will be incorporated into our redevelopment efforts with the Rockford Park District. A major component of the infrastructure reuse will be the improved public access to the Rock River which is an important part of the City's infrastructure as it is legally designated as a public right-of-way. All public utilities will be better utilized with redevelopment. Native landscaping will be restored as the greenway system paralleling the Rock River is completed. The City and Rockford Park District would have several opportunities to develop storm water management and reuse innovations, especially the ability to incorporate water quality improvements and water features into the Rock River Corridor Greenway program. Some of the best opportunities for these innovations will be at riverfront locations where large industrial structures have been removed or will be removed as part of the redevelopment efforts. The majority of these riverfront factories were built on fill from demolition of previous structures giving the City the opportunity to address both storm water and debris/fill issues at the same time.

c) *Green building/energy efficiency*. The City will incorporate green building/ green roof/ energy efficiency into all adaptive reuse projects. The site's structures are designated as contributing structures to a Historic District; therefore, the building shell and structures will most likely be reused saving valuable resources.

## 2) Promote Economic Benefits

The City's two primary goals to provide adaptive reuse and /or redevelopment of the site 1) to include a major public open space component consistent with the Rockford Park District's plan for a continuous recreational path greenway corridor along both sides of the Rock River with city parks, boat launches and other major facilities at various points within the system and designed to compliment the City's redevelopment efforts and 2) to provide adaptive reuse or redevelopment of these areas to replace brownfield properties with residences, retailers, offices and public destination points all of which contribute to the tax base as these areas are revitalized . The two goals are integrated because public access to the riverfront will be restored even though adjacent property will be restored through the site.

## 3) Promote a Vibrant, Equitable and Healthy Community

The Community Need section clearly shows the economic distress in the neighborhood surrounding the site. The site has a strong link to the existing and planned recreational and park areas, having the goal of creating a walkable community linked with other walkable communities and a retail component to serve surrounding neighborhoods or newly created residential communities or, in some cases, to serve major public attractions. These will be walkable communities promoting walking and other health-oriented recreational activities including bicycling and kayaking focussed on the Rock River and its adjacent Greenway corridor. Mixed income housing will compliment the surrounding neighborhoods, strengthening existing retail and promoting new retail by providing a larger more diverse population within the trade area.

Smart Growth principles will be incorporated into these redevelopment plans to include improved public transportation services and other public infrastructure, diverting capital

improvements away from expansion on the City's fringe and focussing on the brownfield properties.

#### **D. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose**

Rockford is committed to including greenspace and open space in urban redevelopment strategies for brownfield sites. The 2020 Plan for Rockford, places an emphasis on smart growth techniques which includes making a commitment to preserving the greenspace that is available to City and preventing the consumption of land on the City's fringe. One of the City's goals is to preserve open space, farmland, natural beauty and critical environmental areas. In order to accomplish this goal, the City will partner with the Rockford Park District and other non-governmental organizations to acquire and protect land; support tree preservation; reestablish native landscaping and employ development strategies that better protect and preserve open space. Protecting and preserving the Rock River Corridor also provides a major amenity to the redevelopment taking place in these same brownfield areas.

A high priority for the City is the redevelopment along the Rock River. Recreational use along the Rock River is consistent with Rockford's Riverfront Redevelopment Plan as well as the Rockford Park District Plan for a continuous recreational path along both sides of the Rock River. Davis Park is an existing park along the Rock River and serves as an anchor to the south end of the Rockford's Downtown. To the south are three additional areas: the Rail yards, Barber Colman Village North and Barber Colman Village South. Successful creation of the Greenways as planned would provide: a) a continuous Pathway from Davis Park south for two miles, b) a pathway connecting with the Davis Pecatonica Prairie Path and serving as a section of the Grand Illinois Trail, c) planned public Fishing Parks near the dam and the confluence of Kent Creek and the Rock River and d) a major access point to the trail system at an expanded South Park. The City intends to make connections to Davis Park from the North and from the east across an existing railroad bridge and a reconstructed Morgan Street Bridge. It is important to note that a large number of the brownfield sites are located within the 100-year floodplain of the Rock River. The removal of certain structures will, in many cases, require the reestablishment of the flood plain and its native landscaping.

This Cleanup site is located within a few hundred feet of the proposed Greenway/Pathway along the Rock River and , when redeveloped , this site will be linked to the Rock River Greenway. The City intends to make connections to Davis Park and create recreational corridors along the Rock River through the redevelopment of some of the blighted industrial properties that currently exist along the River.

#### **E. Pre-Award Community Notification**

Rockford understands the importance of involving the community in brownfield redevelopment. Rockford has reached out to the community to notify them of the federal grant opportunities and the proposed cleanup of this site for several months and through several methods.

1. The City of Rockford has been actively involved in the community in its brownfield initiatives. Wayne Dust, local Brownfield Coordinator and Planning Administrator for the

City of Rockford has presented an overview of the City's intent to apply for USEPA Brownfield Assessment and Cleanup Grants at several of Alderman Bell's Fifth Ward meetings conducted at the Rockford Montague Branch Public Library starting on June 29<sup>th</sup> 2006 and continuing on October 26<sup>th</sup> 2006 and November 30<sup>th</sup> 2006. He has provided a status report on current environmental assessment activities as well as identifying the City's intent to apply for cleanup grants and revolving loan funds for Barber Colman Village sites all located in the Fifth Ward. Strong support to apply for these Cleanup Grant funds was expressed by the citizens of the Fifth Ward at each of these meetings. It is also important to note that the Public Hearing for the BCRLF cleanup for the Invensys Metal Plating facility, also located within Barber Colman Village was conducted at the same Montague Branch Library on March 31, 2005 and Alderman Bell's Monthly Fifth Ward Meeting immediately followed the close of the public hearing. The people of the Fifth Ward have been kept well informed of the City's efforts to redevelop numerous Brownfield sites and have been very supportive of the City's efforts.

2. The Brownfields Coordinator will continue to inform all of the Alderman concerning all of the Brownfields Programs and request the Aldermen to schedule the Brownfields Coordinator on their Ward meeting agendas. Input provided and concerns expressed by the Community and the Alderman will be major considerations in the Cleanup process.
3. To further inform the general public, Rockford has published the USEPA Proposal Guidelines on the Community and Economic Development Department site on the City's WebPages starting November 22, 2006, and has placed copies of the Proposal Guidelines at the Montague Branch Library and Main Downtown Library. General information is provided on both the web page and attached to the printed Proposal Guidelines indicating the nature of the grant opportunities Rockford is pursuing and providing the contact name, telephone number and e-mail address of the Brownfields Coordinator, Wayne Dust, if they have any questions. The City's web page is <http://www.cityofrockford.net/>

Rockford published a notice in the Rockford Register Star on November 24, 25 and 26<sup>th</sup> 2006 that the City is pursuing federal grant funding for brownfield redevelopment. The newspaper notice directs people to the City's web pages for further information and also provides the contact name, number and e-mail address for the Brownfields Coordinator. This Grant Application will be posted on the City's web page on December 8<sup>th</sup> along with the contact information for the Brownfields Coordinator, Wayne Dust

A resolution was presented at the Planning and Development Committee of City Council on November 27<sup>th</sup> 2006, approved by Committee and read at the City Council that same evening. The resolution granted approval for the City staff to submit the grant applications to USEPA. This received news media coverage.

4. The City will compile all comments received from the public. Depending on the volume received the City will address each comment and provide a response back to the person making the comment. If a large volume of comments is received the City will post a comment/response document on the City's web pages to inform the public. The City will make every effort to address the concerns of the public in our applications, assessment

activities, and cleanup activities. The City understands the importance of the public in our redevelopment pursuits and fully intends to involve our community.

#### F. Ongoing Community Involvement

1. The City of Rockford has actively involved the community in its brownfield initiatives and will continue to work within the affected community. The Fifth Ward is the most severely affected community by Brownfields and is the location for this proposed cleanup site. Within the Fifth Ward, the Brownfields Coordinator and other staff of the Department of Community and Economic Development have worked closely with Alderman Victory Bell and the group of citizens and business leaders who attend his Ward Meetings. The Brownfields Coordinator has presented information, asked for citizen input and presented status reports concerning cleanup proposals and reuse planning within the Fifth Ward during the past several years. One area in particular, the City-owned former Barber Colman Manufacturing plant and the adjacent, largely privately-owned deteriorated industrial area to the north referred to together as Barber Colman Village has been the focus of these presentations and discussions for the past several years. This involvement with the Community (the Fifth Ward) was initiated with the City Acquisition of the former Barber Colman Manufacturing Plan in late January 2002, continuing with a two-day neighborhood charette on Barber Colman Village in September of 2002, preparation of a Master Development Plan during 2004, and cleanup of a portion of the City-owned property known as Invensys Metal-Plating facility in August of 2005. Throughout this process, Alderman Bell and his involved constituents and business organizations in the area such as Southwest Ideas for Today and Tomorrow (SWIFT) have been kept well informed. These organizations have provided valuable input and dialog with the City Staff. The City proposes to utilize the Cleanup Grants and Revolving Loan Fund to complete the Cleanup of this site as part of the continuing process to redevelop this extensive Brownfield area..
2. The City is actively developing partnerships for redevelopment projects at the local, state and federal levels. The City developed a Master Plan with the assistance of the Rockford Local Development Corporation (RLDC) for the Barber Colman Village area and is continuing discussions with potential developers. Working with the RLDC, a portion of the former Barber Colman facility was redeveloped, following assessment and cleanup, as a new grocery store, Gray's IGA, serving the surrounding area. Also the City has partnered with Winnebago County and the U.S.General Service Administration for the development of the Winnebago County Justice Center and the Federal Courthouse. Following assessment and cleanup activities, construction on the \$100 million dollar Winnebago County Criminal Justice Center began in the spring of 2005 and is now nearing completion. The site for the Federal Courthouse is ready for construction, which is anticipated to begin in early 2007. Environmental Assessments were performed during 2003 and 2004 and an NFR letter was received from Illinois EPA during 2005.

The City plans to develop additional partnerships to successfully accomplish sustainable development at each of the cleanup sites.

Successful redevelopment efforts at the site will require partnerships with the Rockford Park District because of the plan for Pathways and Greenway corridors to be connected to the site. The River District Business Association is actively involved in promoting the successful redevelopment areas because all of these areas will positively affect Downtown is successfully redeveloped.

3. The Brownfields Coordinator will communicate the progress of the Brownfields projects each month at Ward Meetings conducted in the Fifth Ward. Since there is a sizeable Hispanic population within the site area, the Brownfields Coordinator will be accompanied by a Spanish interpreter from the Department of Community Development. There are three interpreters currently on staff in this department. This will encourage additional dialog within the site neighborhood.
4. Community-based Organizations

a) **The River District** is a downtown community based organization that takes an active role in the planning around the Rock River within the City's Central Business District. A representative from the River District is Kim Wheeler, Executive Director. Ms. Wheeler may be reached at 815.964.6221.

b) **The Rockford Local Development Corporation (RLDC)** is a nonprofit organization that is currently working with the City on the redevelopment of the Barber Colman Village as well as other redevelopment efforts in the City's TIF Districts. The RLDC is an active organization in our community that provides support for local businesses. Mr. John Phelps is the Executive Director of the RLDC. His contact information is 815.987.8675

c) **Southwest Ideas for Today and Tomorrow (SWIFT)** is a non-profit community based organization which works with both residents and businesses while serving the southwest side of Rockford. Roger Sexton is the Executive Director and he regularly attends Alderman Victory Bell's Fifth Ward Meetings to coordinate with the City. The contact person is Roger Sexton, 815-965-3606.

d) **Comprehensive Community Solutions, Inc.** in conjunction with their YouthBuild program have worked in the past and continues to work with the City on construction projects that allows troubled youths the opportunity to develop their vocational skills on redevelopment projects. The contact person is Kerry Knodle, 815-963-6236.

In addition to the community organization listed above, the City of Rockford frequently partners with the Rockford Park District, which is a separate regional taxing district with an elected governing board. The Director of the Rockford Park District is Tim Dimke, 815 -987-8800.

## **G. Reduction of Threats to Human Health and the Environment**

1. The City will use the funding to remediate the property for redevelopment and reuse. The City has taken the appropriate measures to prevent exposures of contaminants by securing the property and limiting access. This is especially important due to the flaking lead-based paint and asbestos containing materials within the buildings. The end use of the property will be for commercial/retail space and for recreational use. The existing buildings will be remediated so that the infrastructure may be reused. The soils will be addressed through engineered controls and institutional controls. The City will use every effort to incorporate the remediation plans for the site with the redevelopment plans.
2. The City has entered the site into the IEPA SRP. This program is a voluntary program that incorporates the Tiered Approach to Corrective Action Objectives (TACO). All assessments that are conducted will be in accordance with the SRP and TACO Guidelines. The City will then work with the State assigned project managers to establish the appropriate cleanup activities for the site. The SRP will issue a NFR letter once cleanup activities are complete and a Remedial Action Completion Report (RACR) has been submitted to and approved by the IEPA.
3. The proposed cleanup for the site is to remove the loose and fallen lead based paint and to encapsulate the paint so that the buildings may be reused. The remediation also includes the removal of the asbestos materials for building reuse or demolition depending on the redevelopment plan for the property. The remediation plan for the site soils and groundwater exposure pathway are to install engineered barriers and provide for institutional controls that will eliminate the use of groundwater for potable water at the site. The overall remediation costs for the cleanup of this property is approximately \$1.2 Million.

## **H. Leveraging of Additional Resources**

1. The City staff members are committed to working in the Brownfield Program. The City has provided personnel services as leverage in obtaining state and federal funding. Rockford has a dedicated Brownfield Coordinator whose time is spent in managing federal dollars, coordinating with public officials, environmental consultants, USEPA, IEPA, as well as working with the affected communities. Our City has the full support of our elected officials and especially our Mayor, who is actively involved in the Illinois Chapter of the National Brownfield Association.

In the past year, the City has held regular meetings on planning and coordinating with the developers for the Barber Colman Village. The City has had up to 15 staff members involved in this project, at approximately 10-15 hours a week.

In addition to dedicating personnel time to our Brownfield program, the City has created Tax Increment Financing (TIF) districts. Currently, the City has 21 TIF districts existing or in process, with seven of these TIF Districts being established during 2006. These TIF Districts have been created and are being created for the purpose of supporting redevelopment within economically depressed areas. This Cleanup site is located in the South Rockford TIF.



The property is located within a designated Historic District on the National Register of Historic Places; therefore, historic preservation tax credits and other historic property grants would apply to the reuse of these structures. Each structure on the property has been deemed to be contributing; therefore, historic preservation tax credits are applicable to each structure.

In addition, the City of Rockford has been designed as one of three cities within the State of Illinois as a pilot City for River Edge Redevelopment Zone Program. Some of the incentives that are available through this program are sales tax abatement for construction materials, investment tax credit, and a total of \$2M for redevelopment related activities such as infrastructure improvements and environmental remediation tax credits.

2. The City will leverage private, state, and other federal dollars to foster redevelopment for the site. The City is applying for the Revolving Loan Fund Grant to supplement the cleanup grant. The City is also actively pursuing private partnerships for the redevelopment of the site. The incentives listed in #1 above will help the City leverage these private dollars for redevelopment.

#### **I J. Programmatic Capability**

1. The current Brownfields Coordinator, Wayne Dust, Planning Administrator for the City of Rockford, has managed several USEPA Grants during the past four (4) years. During the summer of 2003, the USEPA Brownfields Pilot Grant was successfully closed out. During the fall of 2003, the City of Rockford entered into a Cooperative Agreement with USEPA concerning the two (2) Assessment Grants awarded to Rockford during the 2002-2003 grant cycle. Contracts were awarded to two (2) environmental consulting firms in January of 2004 and considerable progress has been made towards the completion of these assessment activities which will be completed in September of 2007. Significant accomplishments of the Petroleum Assessment Grant include: 1) the completion of the Phase I ESA for several petroleum sites located at the site of the \$ 100 million Winnebago County Justice Center which is now nearing completion; 2) the completion of Phase I ESA at a redevelopment site in Downtown and 3) completion of desktop Phase Is for two major transportation corridors (Broadway and Kilburn Avenue and the west side of Downtown (these reports have been very valuable step as potential redevelopment sites are further assessed.) The Quarterly Progress Reports have been prepared by Mr. Dust, submitted to USEPA, and approved on a regular basis. During the fall of 2005, the City of Rockford entered into a Cooperative Agreement with USEPA concerning two (2) Assessment Grants awarded to Rockford during the 2004-2005 grant cycle. Contracts were awarded to three (3) Environmental Consulting firms during February of 2006, and major progress has been made in the environmental assessment of the City-owned Ingersoll site. The Phase II ESA was started on this site on November 27, 2006 and petroleum product has been found under the building. Quarterly reports have been prepared by Mr. Dust, submitted, and approved on an ongoing basis for these Assessment Grants.

The City of Rockford also received a Brownfields Revolving Loan Fund Award of \$500,000 in 2000. Under Mr. Dust's supervision, this Revolving Loan was used to clean up the Invensys Metal Plating site at Barber Colman to be used as a future section of the Riverfront Greenway along the Rock River. In addition, two (2) Illinois EPA Assessment Grants totaling 240,000 were awarded, completed, and closed out. These assessment efforts, together with the City's

acquisition and clearing of a mixed industrial and commercial site, culminated in the receipt of the No Further Remediation letter from the Illinois EPA for the five (5) acre site acquired by the City of Rockford for the New Federal Courthouse, a \$70 million construction project.

2. The Brownfields Pilot Grant was closed out during the summer of 2003 and confirmed by correspondence from USEPA. The Brownfields Cleanup Revolving Loan Fund, used in the Cleanup of the Invensys Metal Plating area, is soon to be closed out

There was only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by Mc Gladrey and Pullen for 2005. Finding 2005-7 stated that..”the City is required to submit quarterly reports to the U.S. Environmental Protection Agency within 30 days after the end of each quarter that details expenditures and other activities under the programs, as well as progress being made at the clean-up sites. We noted that out of eight quarterly reports that should have been filed for the year ended December 31, 2005, six of the reports were late..” The Cause stated “ Delays in submitting the quarterly reports have been due to delays in receiving billings from the five Environmental Consulting firms under contract to perform the environmental work for the City. Section 2.2 of the required quarterly report by USEPA requires documentation of the “Funds Expended” during the reporting period”. The Management’s Response by the City stated... “ If necessary, we are prepared to send an incomplete report to meet the USEPA Cooperative Agreement deadline to be followed by a final report when we have received all of the information” (from the Consulting Firms). It should be noted that the four quarterly reports due July 31, 2006 and October 31, 2006 were submitted on time.

3. During the past four years, the Rockford Brownfields Coordinator has made every effort to comply with the Cooperative Agreement and quarterly progress report requirements for both the BCRLF and the Assessment Grants.

4. The BCRLF Program was awarded in 2000 for the amount of \$500,000 and completed during the winter of 2006 and is now being closed out. These funds were drawn down in their entirety. Cooperative Agreements for two (2) Assessment Grants (Petroleum and Hazardous Substances) totaling \$400,000 were awarded in the fall of 2003 and two (2) additional Assessment Grants were awarded during the fall of 2005. All of these grants are expected to be drawn down in their entirety by the fall of 2007.

5. The Brownfield Pilot Grant and the current Assessment Grants have been instrumental in preparing two (2) sites for major governmental facility construction projects. Environmental Assessments were performed for sites being considered for the new Federal Courthouse from the Pilot Grant. The current Assessment Grant was used to perform a desktop Phase I on the site for the new Winnebago County Justice Center. Both Grants have been used to perform Environmental Assessments at the City-owned Barber Colman Village. Letters of No Further Remediation have been received on a portion of the area comprising approximately one-third of the site. It is the City’s intent to provide housing, riverfront open space, educational opportunities, and additional retail activity at this site following cleanup. The Brownfield Cleanup Revolving Loan was used to cleanup a riverfront site that will become part of the Rockford Park District’s Riverfront Pathway/ Greenway.

